February 2, 2011

## VIA ECF TO:

Hon. Steven M. Gold Chief Magistrate Judge United States District Court, Eastern District of New York 225 Cadman Plaza East Chambers 1217, Courtroom 13-D Brooklyn, NY 11201

Re:

Blumenthal Distributing, Inc. dba Office Star Products et

ano. v. Executive Chair, Inc. dba Shop Seating of Brooklyn (Index # 1:10-CV-01280 (CBA-SMG))

Dear Judge Gold:

Pursuant to the Court's directive during the telephonic conference call held January 31, Plaintiffs Blumenthal Distributing, Inc. dba Office Star Products ("Blumenthal") and Tung-Hua Su and Defendant Executive Chair, Inc. dba Shop Seating of Brooklyn, by their attorneys, hereby submit the following joint letter with respect to the depositions at issue in Plaintiffs' letter application for a protective order.

In light of Barry Barsamian's recent knee surgery and Blumenthal's filing of a Notice of Removal of a state court action filed by Defendant herein against Blumenthal, the parties stipulate to postpone the deposition of Mr. Barsamian to June, 2011 and to extend discovery accordingly.

Respectfully submitted,

POLTORAK PC

CHRISTIE, PARKER & HALE, LLP

Flie C Poltorak Esq.

1650 Eastern Parkway, Suite 400 Brooklyn, New York 11233

(718) 943-8815

Attorneys for Defendant

350 West Colorado Blvd., Suite 500 Pasadena, California 91105

(626) 795-9900

Attorneys for Plaintiffs